## 

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

:

Tiffany S. Newkirk : No. 20-12374-ELF

Debtor :

## NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Debtor, by attorney David M. Offen, has filed a Motion to Modify Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **January 4**, **2022**, you or your attorney must do all of the following:
  - (a) file an answer explaining your position at:
    Office of the Clerk
    U.S. Bankruptcy Court
    Suite 400
    900 Market Street
    Philadelphia, Pa. 19107

If you mail your answer to the Bankruptcy Clerks office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's Attorney David M. Offen, Esquire Suite 160 West, The Curtis Center 601 Walnut Street Philadelphia, Pa. 19106 215-625-9600 Fax 215-625-9734

Kenneth E. West, Esquire Chapter 13 Standing Trustee P.O. Box 40837 Philadelphia, PA 19107

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an Order granting the relief requested in the Motion.
- 3. A hearing on the Motion is scheduled to be held before the Honorable Eric L. Frank, United States Bankruptcy Judge on **January 25, 2022 at 10:00 AM in Courtroom #1,** United States Bankruptcy Court, 900 Market Street, 2nd Floor.

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- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.